

**From:** [Westfall, Constance](#)  
**To:** [Salinas, Amy](#)  
**Cc:** [Mahley, Bill](#)  
**Subject:** Delta Shipyard - Confidential Settlement Communication  
**Date:** Friday, September 1, 2017 12:10:36 AM  
**Attachments:** [EPA - Delta Shipyards Legal Analysis.pdf](#)

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Amy:

Thanks for your time discussing EPA's position on its CERCLA jurisdiction over oil-field drilling material. To explain this to our client, it would be very helpful if you could provide this analysis to us in writing. For your convenience, attached is our legal memorandum which reached a different conclusion.

Also, you stated that EPA would like a response from our client by September 15<sup>th</sup>. I'd like to modify this slightly to two weeks from when we receive EPA's written analysis.

Thanks again and hope you have a great Labor Day weekend,

Connie

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